



November 23, 1999

Winter Use Plan
National Park Service
12795 West Alameda Parkway
Lakewood, CO 80228
Attention: Clifford Hawkes

Dear Mr. Hawkes:

The BlueRibbon Coalition is a nationwide organization representing 500,000 motorized recreationists, equestrians, and resource users. We work with land managers to provide recreation opportunities, preserve resources, and promote cooperation with other public land users. Following are my comments, as Public Lands Director, on the Yellowstone & Grand Teton National Parks and John D Rockefeller Parkway Winter Use Plan (Plan) and Draft Environmental Impact Statement (DEIS).

Process.

I was encouraged as the states and surrounding counties were given cooperating agency status. Although this was not achieved without some objections and controversy, as work on the Plan progressed, it did appear that a working relationship between the National Park Service (NPS) and these cooperators was developing.

I attended, as an observer, the working session held in Idaho Falls. I was heartened to observe the progressive level of exchange that was occurring between federal, state, and local planning professionals.

This spirit deteriorated rapidly in the spring of 1999 as the selected and proposed alternatives were released for internal review. Little of the information that the cooperators had provided was evident. The proposed selected alternative, Alternative B, was simply outrageous. It provoked an outcry from all quarters. Process-wise, it was a slap in the face to the cooperators; an utter rejection of the assistance they had provided.

The NPS delivered the coup de grace to the process in October when, with great fanfare, it released a compilation of old and biased studies alleging "scientific" evidence of snowmobiles' adverse environmental impacts. Released in such a manner, it provided ample fodder for anti-snowmobile groups to hype its erroneous conclusions in a compliant and unquestioning national press. There's an old saying, "Lies can travel halfway around the world while truth is putting on its shoes." Attempts to refute this smear campaign fell far short.

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This information could have been easily included in the EIS, erroneous though it may have been. It could have then been debated and refuted as a part of the process. Instead, this "study" became a tool by which NPS sabotaged its own process.

NPS has so damaged its credibility and relations with the states and surrounding counties that the Senators from these states signed a joint letter of question and rebuke (attached). The tragedy is that it could easily have been avoided, and a true collaborative result could have emerged.

Preferred Alternative "B"

Preferred Alt. "B" will eliminate 70.8% of Yellowstone winter visitors by closing the West Yellowstone entrance to snowmobiles. It will eliminate the Grand Loop experience for everyone. It will eliminate or diminish crucial desired elements of the winter experience for many (48% of winter users as reported in the DEIS). It will eliminate reasonable access to services within and outside Yellowstone. Only 4% of visitors surveyed supported plowing the road prior to the issuance of the Plan and DEIS. Not one group has supported it since the Plan and DEIS was issued.

Plowing and bussing visitors will require a taxpayer subsidy of at least \$25 to \$40 per person in order to reach the "affordable" rate of \$10 to \$20. The DEIS does not sufficiently anticipate the cost of plowing the road, the cost of repairing damage to the road bed that plowing will incur.

The Plan claims that affordable means are needed for minority or low income people to visit the Park. However, the DEIS does not consider the cost of getting to Yellowstone, summer or winter. Few of meager means can get this far. Why do you think a bus and a low entrance rate will make a difference to people to whom a \$50 - \$100 hotel rate is exorbitant?

The Plan and DEIS has ignored the fact that affordable access exists by the means of a plowed road from Gardiner to Mammoth (continuing through to Cooke City). The Mammoth Terraces are world famous, magnificent attractions. Yet only 32% of winter visitors enter from Gardiner - and this percent includes traffic that supports the Cooke City infrastructure (residents and commercial). There is no information on how many visit Mammoth as a destination.

The potential impact of Alt. "B" to wildlife and the resource have not been sufficiently considered. Environmental extremists and opponents of snowmobiling have cited this as have pro-snowmobiling interests. Enjoyment and concern for the well being of wildlife is universal. Among the major concerns are: safety hazards, increased stress during the winter, fragmentation of habitat, and trapping wildlife between snow berms.

We oppose the imposition of four-stroke emission standards on snowmobiles which use two-stroke engines. NPS are not emission experts. NPS needs to defer to the Environmental Protection Agency (EPA) in the development and requirement of emission standards for snowmobiles. NPS has clearly misunderstood the function of a decibel rating by requiring snowmobiles be at 70 decibels (currently they operate at 78). 70 is actually half as loud as 78; this requirement is unrealistic and unmatched by requirements for any other vehicles (including busses).

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Revised Alternative E

Alternative E comes the closest to proposing a viable management scenario for winter recreation in the Parks. A wide spectrum of recreationists, organizations, and business leaders worked on the development of Revised Alt. E. It applies adaptive planning that uses new information as it is developed to responsibly manage winter recreation in Yellowstone and Grand Teton National Parks. Adoption of this alternative will allow the results of new and ongoing research and monitoring to be incorporated into Parks winter recreation management.

The research would be independently reviewed to assure that it is not agenda driven. It would assure that well-founded conclusions are applied as new information is achieved. This would apply to all aspects of winter visitation including emissions research, wildlife studies, and sociological studies.

There would be established an advisory committee to assist with study design and prioritization of ongoing research and monitoring. Local, county, state and federal agencies, as well as representatives from the snowmobile industry and environmental groups, would participate on the committee.

As these new directions are being identified, researched, and validated, there are actions that can be implemented now, with what we know now, to improve Parks visitation. These are:

- * Require the sale of only bio-based fuels within the Parks. Commercial snowmobile operators outside the Parks as well as the general snowmobiling public would be strongly encouraged to use of these products.
- * Establish a visitor carrying capacity based on use patterns related to the past 7 year average to address overcrowding and facility maintenance issues. Use adaptive planning to address long-term carrying capacities for visitors and wildlife.
- * Establish a night time closure in the Parks from 10 PM to 6 AM to promote public safety, improve trail maintenance, and protect wildlife.
- * Disperse use throughout the Parks by better use of existing visitor facilities. In order to accomplish this, provide additional portable warming huts.
- * Revise snowmobile parking in the Old Faithful area to address congestion and visual impact.
- * Provide expanded non-motorized opportunities/trails away from motorized routes. For example, provide regular skier shuttles from Old Faithful and West Yellowstone to non-motorized areas away from these visitor collection points.
- * Require all entrance passes to be pre-purchased at convenient outlets.
- * Maintain the length of the winter use season from mid-December to mid-March.

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* Provide a route for the Continental Divide Snowmobile Trail (CDST) that takes advantage of resource conditions, topography and grade so that both winter grooming and summer bicycle use would be accommodated. For example, use the existing utility corridor for much of the trail.

* Improve grooming on the Grassy Lake Road.

* Continue use by snowmobiles and snowplanes on the frozen surface of Jackson Lake.

* Prohibit plowed road access anywhere in the Parks where it does not presently occur, for example Gardiner-Cooke City road and Hwy. 191 from West Yellowstone to Bozeman.

Conclusion

The genesis of good management for the Parks is included in various places within the Plan and DEIS. Unfortunately, these elements are not pulled together into a coherent whole. Instead, it seems as if NPS has decided to pursue political agendas instead of addressing good management for winter recreation for the Parks. Please give serious consideration to my comments and Revised Alternative E. We need to move away from headline-grabbing and toward progressive winter recreation management.

Sincerely,



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BLUE RIBBON COALITION
<p>Page 1. Re: Information provided by cooperators. The commenter is invited to review Appendix A, Consultation and Coordination in the DEIS. This section documents that a large percentage of the suggestions from the cooperating agencies were incorporated into the range of alternatives presented in the DEIS. Development of the preferred alternative is within the purview of the NPS. The NPS is not obliged to incorporate in the preferred alternative the preferences that might be indicated by the cooperating agencies. Many suggestions for alternatives or alternative features were made in the thousands of comments received. A great deal of criticism was leveled at the current range of alternatives because people did not like the way features were “mixed.” The final selected alternative that is to be documented in a Record of Decision may mix features from the range of alternatives evaluated in the final EIS. Such mixing can occur as long as the mixed features are consistent with one another, and as long as the features and their effects would not fall outside the range of alternatives disclosed in the EIS (§1505.1(e)). A finding as to that circumstance would be entirely appropriate in the Record of Decision, along with the rationale, should the selected alternative not precisely correspond with one of the “mixes” evaluated in detail.</p>
<p>Page 2. Re: Air Quality Summary Report. Criticism stemming from the release of the draft summary ARD report and its content is beyond the scope of this EIS analysis and requires no response. The content of the report, so far as the alleged faulty information, was not a part of the Draft EIS. The fact that the cooperators disagree with how the document was publicized and distributed does not affect the air resources analysis in the EIS.</p>
<p>Page 2. Re: Preferred alternative rationale. This comment restates the disclosure of effects present in the DEIS. Many commenters refer to any disclosure of an impact as “admitting” something. Readers should understand that it is the purpose of an EIS to disclose the possible effects of a proposed action and alternatives to it, and that references to the “justification” for a preferred alternative is an entirely different issue relating to the decision to be made.</p>
<p>Page 2. Re: Costs of road plowing. A disclosure of the costs associated with road plowing can be found in Volume II, Appendix F, Construction and Operating Costs. The costs of both the existing road plowing and road grooming for snowmobiles are in the end absorbed by the taxpayer. Alternative B proposes no subsidy for a park visitor to ride the mass transit bus to Old Faithful. The cost estimated for that service, as identified on page 29 of the DEIS, is \$20 to \$25, not \$10 to \$20.</p>
<p>Page 2. Re: Affordable access. The stated purpose of plowing the road (DEIS, page 28) is to “improve affordable access” – not, as the commenter states, to “provide affordable access for minority and low-income people”. A thorough reading of the EIS would reveal that a required impact topic in an EIS is to evaluate the effects of a proposed action on socially or economically disadvantaged populations (DEIS, page 80). We disagree that this analysis is used as “justification” for plowing in alternative B. The preferred alternative addressed the issue of affordability because it was raised as a concern during the public scoping process. The cost of entering the park during the winter via snowcoach or snowmobile is much higher than entering the park by bus or auto. The intent was to provide an alternative that would be more affordable. As you note in your letter, subsidizing the use of one particular user group is unfair to the taxpayer and excludes others from enjoying their national parks. Alternative B was intended to address these issues by providing access to the park interior for a greater diversity of park visitors, while protecting park resources. Under alternative B snowmobiles, snowcoaches, and mass transit wheeled vehicles would access the Old Faithful Area. Due, in part, to the clear lack of support for plowing the road to Old Faithful the NPS will identify a new preferred alternative in the FEIS.</p>
<p>Page 2. Re: Access to Mammoth. The DEIS has not ignored that a more affordable access exists from Gardiner, Montana to Mammoth Terraces. This area is described on pages 136, 140, 141, and 145 of the DEIS. The North Entrance is the second busiest winter entrance to Yellowstone. As indicated on page 145 of the DEIS traffic using the highway to access Cooke City, Montana is not counted when compiling visitor use statistics for oversnow access. The Mammoth area is, as you indicate in your letter, a popular attraction. However, it does not typically receive a reliable level of snowfall. While the northern areas of the park are popular, the sights most visitors want to experience are Old Faithful and the Grand Canyon of the Yellowstone (see page 148 of the DEIS).</p>
<p>Page 2. Re: Effects on wildlife. The effects of alternative B on wildlife have been disclosed for stress, habitat fragmentation and the trapping of wildlife in road berms. This analysis can be found in Chapter IV of the DEIS on pages 176-327.</p>
<p>Page 2. Re: EPA and emissions standards. The suggestion that the NPS should defer to EPA on the matter of emission standards for snowmobiles is considered in the range of alternatives presented in the DEIS.</p>

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<p>Page 2. Re: Decibel levels. The NPS disagrees that the agency has misunderstood the function of a decibel rating. A range of decibel ratings have been presented (from 60 to 78 dB(A)) in the range of alternatives in the DEIS. The analysis of the effects of these various decibels levels on the natural soundscape of the 3 parks can be found for each alternative in Chapter IV of the DEIS. Impacts on the natural soundscape have received further study and this information will be included in the FEIS.</p>
<p>Page 3. Re: Independent review of scientific studies and monitoring: published studies and monitoring reports should be available to the public. For what should be obvious reasons, this information should not be subjected to a political process in advance of their publication. There are policies and protocols already in place to ensure appropriate scientific review. If future studies or monitoring indicate the need for management action, NPS will follow the requirements already set in law (such as NEPA), regulation and policy. At that time, the scientific basis for an action can be scrutinized and criticized by any interested parties.</p>
<p>Page 3. Re: Establish an advisory committee to assist with study design. For obvious reasons, this information should not be subjected to a political process in advance of their publication. There are policies and protocols already in place to ensure appropriate scientific review. If future studies or monitoring indicate the need for management action, NPS will follow the requirements already set in law (such as NEPA), regulation and policy. At that time, the scientific basis for an action can be scrutinized and criticized by any interested parties.</p>
<p>Page 3. Re: Require the sale of bio-based fuels within the Parks. This is a feature of alternatives B, C and D.</p>
<p>Page 3. Re: Carrying capacity. NPS is encouraged by support for establishing a recreation carrying capacity. In practice, setting a carrying capacity is a highly complex and potentially divisive exercise. NPS managers decided there was not sufficient time available in the settlement time frame to devote to this type of analysis. More explanation of the carrying capacity issue will be included in the FEIS.</p>
<p>Page 3. Re: Nighttime closure. This suggestion will be analyzed as part of alternative G in the FEIS.</p>
<p>Page 3. Re: Disperse use to better utilize existing facilities. Alternatives C, D and G conceptually include the opening of such facilities to one degree or another. A reference to other plans and environmental analysis on page 17 of the DEIS includes commercial services plans for both parks. Since these plans were in process, the decision was made not to include analysis of facilities currently being addressed. Several alternatives (B, C and D) propose new warming huts.</p>
<p>Page 3. Re: Congestion and visual concerns at Old Faithful. This suggestion may be useful in site-specific implementation of any of the alternatives retaining snowmobile use at Old Faithful. It is not a key programmatic feature; i.e. it does not require an EIS analysis for approval – it could be done now.</p>
<p>Page 3. Re: Expanded nonmotorized routes away from motorized routes, served by shuttle service. Additional routes are proposed in alternatives B, C, D and G. This suggestion is programmatically compatible with all alternatives, and could be implemented without further significant environmental review (as a function of the Winter Use EIS and the decision resulting from it). Whether solitude can actually be achieved by this separation depends upon site characteristics and the degree to which motorized use sounds travel in the area.</p>
<p>Page 3. Re: Prepaid passes requirement at West Yellowstone– prepaid passes for other gates. Pre-paid passes are available in West Yellowstone. Should the need arise at other gates for the same reasons, the service could be expanded. The rationale for this measure – mitigating pollution impacts on visitors and employees – has a cost associated with it. Opportunities for necessary NPS-visitor contact at the gate are lost. Suggesting that all visitors forego an important safety element of the park experience, so that their snowmobiles will be less polluting is clearly not in compliance with 36CFR 2.18. The regulation states that snowmobiles are prohibited except where designated and only when their use is consistent with the park’s natural, cultural, scenic and aesthetic values, safety considerations and will not disturb wildlife or damage park resources. In this case, mitigating an effect on park values and resources by completely eliminating an important information and safety resource for park visitors is illogical. Voluntary compliance with this management option is reasonable, but only for those visitors who wish to utilize it.</p>
<p>Page 3. Re: Length of season. The length of the winter season is currently mid December to mid March and is analyzed as part of alternative A, the no action</p>

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alternative.	
Page 4. Re: CDST. This suggestion is a feature of alternative B in the DEIS.	
Page 4. Re: Improve grooming on the Grassy Lake Road and permit commercial outfitters. These measures do not require a programmatic EIS. They could be considered at any time.	
Page 4. Re: Continue snowmobiles and snowplanes on Jackson Lake. This suggestion is a feature of alternatives A and C in the DEIS.	
Page 4. Re: Continue existing plowed road access in YNP. This is a feature of alternatives A, D, E, F and G.	